

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

(Electronically Filed February 16, 2021)

_____)	
BOTTOM LINE, INC.,)	
)	
Plaintiff,)	Case No. 15-445 L
)	
v.)	Hon. Eric G. Bruggink
)	
THE UNITED STATES OF AMERICA,)	
)	
Defendant.)	
_____)	

**JOINT MOTION FOR ENLARGMENT OF
TIME AND TO AMEND SCHEDULING ORDER**

Pursuant to Rule 6.1 of the Rules of the United States Court of Federal Claims, the parties jointly and respectfully request an approximately two month enlargement of the pending deadlines in this case, including the March 1, 2021, deadline to complete fact discovery. *See* ECF No. 76.

The parties request additional time to schedule depositions and conduct other fact discovery while working through COVID-related complications. Since the Court granted the most recent extension in this case, the parties have tentatively scheduled at least three depositions. However, due to family health and childcare issues, the parties will need additional time to schedule those and other depositions and conduct further fact discovery.

The parties now jointly request the following schedule:

1. The parties shall complete all fact discovery on liability on or before **April 30, 2021**;

2. Plaintiff shall provide to the United States its expert reports on liability on or before **July 2, 2021**;
3. The United States shall provide to Plaintiff its expert reports on liability on or before **August 2, 2021**;
4. The parties shall complete expert discovery on or before **September 17, 2021**;
5. The parties shall file a joint status report and proposal for further proceedings by **October 1, 2021**.

The foregoing Joint Proposed Schedule for Further Proceedings has been jointly prepared by the parties and filed by the United States.

Dated: February 16, 2021

MOFFITT & PHILLIPS, PLLC

/s/ Brandon K. Moffitt
BRANDON K. MOFFITT
Moffitt & Phillips, PLLC
204 Executive Ct., Suite 100
Little Rock, Arkansas 72205
Telephone: 501-255-7406
Facsimile: 866.460.5744
bmoffitt@moffittandphillips.com

Counsel for Plaintiff

Respectfully submitted,

JEAN E. WILLIAMS
Acting Assistant Attorney General
Environment & Natural Resources Division

Christopher Chellis
CHRISTOPHER M. CHELLIS
Trial Attorney
United States Department of Justice
Environment & Natural Resources Division
Natural Resources Section
P.O. Box 7611
Washington, D.C. 20044-7611
Tel: (202) 305-0245
Fax: (202) 305-0506
christopher.chellis@usdoj.gov

Counsel for the United States